



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street, 3<sup>rd</sup> Floor  
New York, New York 10007

November 17, 2021

**BY ECF**

Hon. Victor Marrero, United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write jointly on behalf of all parties respectfully to request a further adjournment of the deadline for Plaintiffs to file an application, if they choose to do so, for fees under the Equal Access to Justice Act. The deadline is currently November 19, 2021. (ECF No. 132). The parties seek an adjournment until January 7, 2022, to allow them additional time to discuss the issue of fees and whether litigation will be required. In particular, the defendants continue to analyze and assess Plaintiffs' demand, and have also continued to be delayed by other docket responsibilities of the undersigned counsel, including an imminent trial scheduled to take place before the end of the year.

The parties thank the Court for its consideration of this joint request.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York  
*Attorney for Defendants*

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